

Requirement and respectfully request consideration of all claims for the reasons set forth below.

Applicants respectfully submit that for such a requirement to be proper, “[t]here must be a serious burden on the examiner if restriction is not required.” MPEP §803. Applicants respectfully submit that (1) all groups of restricted claims are properly presented in the same application; (2) undue diverse searching should not be required since the Examiner previously conducted a search as to all claims; and (3) all claims should be examined together. For the foregoing reasons, it is respectfully submitted that the restriction/election requirement should be withdrawn and an action on the merits of all the claims is respectfully solicited.

### **III. Rejections under 35 U.S.C. §§102 and 103**

Claims 1, 2, 4-10, 11-17, 19, 21-15, 27 and 29 have been rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,216,612 to Cornett et al. Claim 3 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Cornett in view of U.S. Patent No. 4,980,826 to Wagner. Applicants respectfully traverse the rejection of these claims for the reasons set forth below.

#### **CLAIMS 1 AND 21**

Independent claims 1 and 21 are directed to an arrangement in which a received order for a part from one domain is expanded into its component parts (e.g., sub parts) and an order for each of the expanded component parts is communicated to another

domain. Each domain is a unit of processing in a computer system corresponding to a working unit on a production line.

On the contrary, Cornett provides a maintenance system 1 which cooperates with a manufacturing system 10 that controls the operations of a plurality of production complexes (e.g., 14A . . . 14N). Maintenance system 1 includes a controller 2 having a maintenance schedule management subsystem 3, engineering change control (ECC) management subsystem 4, parts manual management subsystem 5, spares inventory management system 6, spares inventory file 8, parts manual file 7 and master maintenance schedule file 9. Maintenance system 1 is employed to facilitate maintenance of equipment at the production complexes, such as repairs of such equipment and ordering spare parts for such equipment. Manufacturing system 10 includes a controller 11 which in combination with engineering change control file 12 and master production schedule file 13 control the operations of a plurality of production complexes. As such, Cornett simply does not disclose or suggest the claimed domain, i.e., where each domain is a unit of processing in a computer system corresponding to a working unit on a production line, or communication of orders between such domains.

Further, the Examiner's reliance on Cornett as teaching such domains is simply improper. See Office Action, pages 4-5. That is, the Examiner appears to be reading each of the subsystems 3, 5 and 6 of maintenance controller 2 as a separate domain. However, subsystems 3, 5 and 6 (and their corresponding files 9, 7 and 8 respectively) do not individually correspond to a separate production facilities or involve production itself, but rather are part of the maintenance system 1 which facilitates upkeep

of equipment at the plurality of production complexes. These subsystems simply do not perform any of the claimed processing of the claimed domain.

As Cornett does not disclose or suggest the claimed domain arrangement and the Examiner relies upon the aspects of the maintenance system 1 (which involves the upkeep of equipment at the production complexes), it necessarily follows that the reference also does not disclose or suggest the claimed expansion means which expands an order for a part (received from a domain) into its component parts or communications means which communicates an order for each component part to a third domain.

Accordingly, claims 1 and 21 and their dependent claims are believed to be patentably distinguishable over the cited reference. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

**CLAIMS 11, 12, 22 AND 23**

Independent claims 11, 12, 22 and 23 are directed to an arrangement in which (1) a received order for a part is expanded into its component parts and an order for each of the expanded component parts is communicated to another domain and (2) communication of an order to another domain is stopped in a case where an amount of specific parts contained in inventory is greater than a required amount of specific parts. Each domain is a unit of processing in a computer system corresponding to a working unit on a production line.

As discussed above for claims 1 and 21, Cornett does not disclose or suggest the claimed Domain arrangement or the claimed expansion or communications.

Further, Cornett as relied upon by the Examiner does not disclose or suggest stopping of an order to another domain in a case where an amount of specific parts contained in inventory is greater than a required amount of specific parts. In particular, the Examiner relies on steps 224 and 244 of Fig. 27 which relate to the operational sequence of closing ECN's. For example, in step 224, a maintenance request (MR) is suspended if a part is not under ECN control or if MR is closed but the ECN is still open. That is, Fig. 27 relates to MRs employed in updating a parts file (e.g., 7) according to engineering changes, and is simply different and unrelated with stopping an order to another domain in a case where an amount of specific parts contained in inventory is greater than a required amount of specific parts. Further, this aspect of Cornett is also related to maintenance of production equipment which is different than the claimed arrangement.

Moreover, the Examiner is arbitrarily picking and choosing from various portions of Cornett in addressing the claimed stopping. For example, the Examiner relies on Fig. 27 (as discussed above) which is related to closing of ECNs, on col. 13, lines 30-34 which is related to determining actual run hours and future run hours to determine projected parts replacement, on col. 16, line 65 et seq. which relates to long range maintenance plans (e.g., performed in quarters for one year to ten years) involving assigning each product to complexes for production, and so forth.

Accordingly, claims 11, 12, 22 and 23 and their dependent claims are believed to be patentably distinguishable over the cited reference. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

**CLAIMS 13 AND 16**

Independent claims 13 and 16 are directed to an arrangement in which (1) a received order from one domain is expanded in another domain into its component parts and (2) permission to access ordering information is controlled through control means. Each domain is a unit of processing in a computer system corresponding to a working unit on a production line.

As discussed above for claims 1 and 21, Cornett does not disclose or suggest the claimed Domain arrangement or the claimed expansion.

Cornett, as relied upon by the Examiner, also does not disclose or suggest permission control to access ordering information. The Examiner relies on parts manual management subsystem 5 and Figs. 10A-10D which illustrate hierarchical listing of parts file. Subsystem 5 and parts file 7 simply do not disclose or suggest any such permission control to access ordering information. Subsystem 5 and Figs. 10A-10D all relate to maintenance of equipment at the production complexes, which is simply different than the claimed arrangement.

Accordingly, claims 13 and 16 and their dependent claims are believed to be patentably distinguishable over the cited reference. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

**CLAIM 24**

Independent claim 24 is directed to an arrangement in which (1) a received order from one domain is expanded into its component parts and an order for each of the expanded component parts is communicated to another domain and (2) information

relating to a part delivery in accordance with an order is inputted in a database. Each domain is a unit of processing in a computer system corresponding to a working unit on a production line.

As discussed above for claims 1 and 21, Cornett does not disclose or suggest the claimed Domain arrangement or the claimed expansion or communications.

Cornett, as relied upon by the Examiner, also does not disclose or suggest input into a database of information relating to a part delivery according to an order. Particularly, the Examiner appears to rely on the update of parts file 7 as reading upon the claimed input. However, the update of parts file 7 is simply unrelated to information relating to a part delivered in accordance with an order being inputted in a database. Again, the aspects of Cornett relied upon by the Examiner relate to maintenance of equipment at the production complexes, which is simply different than the claimed arrangement.

Accordingly, claim 24 and any dependent claims therefrom are believed to be patentably distinguishable over the cited reference. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

**CLAIMS 9 AND 29**

Independent claims 9 and 29 are directed to a parts ordering system and a program, respectively, in which a machining plan is devised based on a received order from a domain in a first network connected via a public line, expansion is performed into each component part according to the machining plan, an order plan is devised for each expanded component part and order is placed according to the order plan.

For similar reasons as discussed above for claims 1 and 21, Cornett does not disclose or suggest the claimed Domain arrangement or the claimed devising of a machining plan, expansion of an order, and devising of an order plan. Again, the aspects of Cornett relied upon by the Examiner relate to maintenance of equipment at the production complexes, which is simply different than the claimed arrangement.

Accordingly, claims 9 and 29 and their dependent claims are believed to be patentably distinguishable over the cited reference. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

**CONCLUSION**

Based on the foregoing remarks, Applicants respectfully request reconsideration and withdrawal of the rejection and allowance of this application. In the event the Examiner considers the above arguments unpersuasive, Applicants respectfully request an interview prior to issuance of a Final Office Action in order to facilitate prosecution of this application.

**AUTHORIZATION**

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4503, Order No. 1232-4457. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

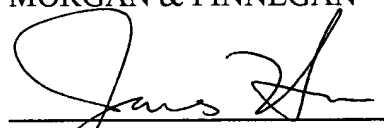
In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4503, Order No. 1232-4457. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

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